

# **Exhibit A**

Designation Run Report

# Ciavarella 07-29-14 Hyde Trial Run submitted to Judge V1

---

Ciavarella, David 07-29-2014

---

---

**Plaintiffs Designations 00:47:47**

---

**Defense Designations 00:16:14**

---

**Plaintiffs and Defense Counters 00:00:05**

---

**Total Time 01:04:06**



Page/Line

Source

ID

53:17 The fracture of a Recovery filter  
 53:18 resulting in a fragment then going into the heart,  
 53:19 specifically the right atrium, that's something that,  
 53:20 in the situation you described, could have resulted  
 53:21 in death had there not been urgent open heart surgery  
 53:22 to effect a repair and remove the fragment.

53:23 A. Yes.

53:24 Q. And it is, from a medical standpoint,  
 53:25 foreseeable that if the Recovery filter fractures and  
 54:1 a piece of the arm or leg of the filter travels, it  
 54:2 is foreseeable that it will travel into the heart.

54:3 That's true, isn't it?

54:5 - 54:11

**Ciavarella, David 07-29-2014 (00:00:31)**

09\_12\_14 V1.103

54:5 A. Well, it's foreseeable that it -- it  
 54:6 could travel that way because that is the direction  
 54:7 which blood flows. But as I was saying before, most  
 54:8 of the fragments didn't make it that far, but -- but  
 54:9 a good proportion of them did, or a minority, but a  
 54:10 good number of them did make it that far, even into  
 54:11 the heart and through the heart out into the lungs.

55:22 - 56:13

**Ciavarella, David 07-29-2014 (00:01:20)**

09\_12\_14 V1.16

55:22 Q. What kind of injuries, let me be  
 55:23 specific, can a fragment of a fractured filter cause  
 55:24 if that fragment migrates?

55:25 A. Well, the -- if it migrates to another  
 56:1 part of the vascular system or to the heart, the  
 56:2 concern would be that it would damage the lining of  
 56:3 the vessel or the lining of the heart.  
 56:4 That's -- that's a theoretical possibility, and one  
 56:5 which we saw in a couple of cases where it punctured  
 56:6 or somehow made its way into the wall of the -- of  
 56:7 the heart, itself, the myocardium, and then through  
 56:8 the wall, and caused bleeding around the heart.

56:9 Q. And so you used the word "theoretical."  
 56:10 You actually -- it wasn't theoretical, you've  
 56:11 actually become aware of a case in which that  
 56:12 happened.

56:13 A. Yes.

58:5 - 59:18

**Ciavarella, David 07-29-2014 (00:02:34)**

09\_12\_14 V1.17

58:5 Q. what is the danger, if any, that a